1			
2			
3			
4			
5			
6			
7			
8		The Honorable John C. Coughenour The Honorable Michelle L. Peterson	
9	UNITED STATES DIS		
10	WESTERN DISTRICT OF WASHINGTON AT SEATTLE		
11	JAMES MOSELEY,	NO. C20-1311-JCC-MLP	
12	Plaintiff,	NOTICE OF SETTI EMENT	
13	v.	NOTICE OF SETTLEMENT WITH REQUEST FOR TIME TO FILE STIPULATED DISMISSAL	
14	STATE OF WASHINGTON, et al.,	AND [ <del>PROPOSED</del> ] ORDER	
15	Defendants.		
16	TO: JAMES MOSELEY, Plaintiff		
17	,		
18	TO: DARRYL PARKER, Plaintiff's Attorney TO: CLERK OF THE COURT		
19		to the above-reference matter have reached a	
20	PLEASE TAKE NOTICE that the parties to the above-reference matter have reached a		
21	SETTLEMENT of all claims that will fully resolve this matter.  The parties request the Court strike the trial date and all related dates and allow the parties		
22	to file a Stipulated Motion for Dismissal by April 25, 2024. The parties understand that, should		
23	to file a Stipulated Motion for Dismissal by April 25, 2024. The parties understand that, should they fail to file a Stipulated Motion for Dismissal by April 25, 2024, the Court will order post-		
24	settlement dismissal.	by riphir 23, 2021, the court will order post	
25	[Signatures and Proposed Order on Following Page]		
26			

1

1	DATED this 27th day of March, 2024.	
2		
3	ROBERT W. FERGUSON Attorney General	CIVIL RIGHTS JUSTICE CENTER, PLLC
4		g/Dannyl Pankan
5	s/ Scott Barbara SCOTT M. BARBARA, WSBA No. 20885	s/ Darryl Parker DARRYL PARKER, WSBA No. 30770
6	Senior Counsel - Torts Division 800 5th Ave, Ste. 2000	1833 N 105 <sup>th</sup> Street, Suite 201 Seattle, WA 98133
7	Seattle, WA 98104 Tel: 206-389-2033	Tel: 206-557-7719 Email: dparker@civilrightsjusticecenter.com
8	Email: scott.barbara@atg.wa.gov Attorneys for State Defendants	Attorney for Plaintiff
9		
10		
11	[ <del>PROPOSED</del> ] <b>ORDER</b>	
12	IT IS SO ORDERED that, in light of the parties' Notice of Settlement, the parties shall file	
13	a Stipulated Motion for Dismissal by April 25, 2024 and, failure to do so shall result in the Court's	
14	entering an order of post-settlement dismissal.	
15	DONE THIS 27th day of March 2024.	
16		1
17	Joh C Cogher a	
18	John C Coylin a	
19	$\overline{ m U}.$	S. District Judge
20		
21		
22		
23		
24		
25		
26		

1	CERTIFICATE OF SERVICE
2	I certify that I caused a copy of this document to be served on all parties or their counsel
3	of record on the date below as follows:
4	Email, per e-service agreement
5	Darryl Parker, WSBA #30770
6	Civil Rights Justice Center, PLLC 1833 N 105th Street, Suite 201
7	Seattle, WA 98133 T: (206) 557-7719
8	F: (206) 659-0183
9	dparker@civilrightsjusticecenter.com Attorneys for Plaintiff
10	Copies to:
11	pbussard@civilrightsjusticecenter.com vsharma@civilrightsjusticecenter.com
12	☐ CM/ECF Filing System Electronic Service
13	DATED this 27th day of March, 2024.
14	
15	s/ Scott Barbara SCOTT M. BARBARA, WSBA No. 20885
16	Assistant Attorney General 800 5th Ave, Ste 2000
17	Seattle, WA 98104 Tel: 206-464-7352
18	Fax: 206-587-4229 Email: scott.barbara@atg.wa.gov
19	
20	
21	
22	
23	
24	
25	
26	